

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Adam Scott, hereby swear and affirm as follows:

1. I am a Special Agent (hereinafter “SA”) with the Federal Bureau of Investigation (hereinafter “FBI”) and, as such, I am charged with enforcing all federal laws in all jurisdictions of the United States, its territories and possessions. I have been employed as an FBI SA since 2017. As an FBI Special Agent I have received extensive training in the investigation of violations of federal and state law. I have been trained in numerous investigative methods that involved personally obtaining and assisting in the execution of federal search warrants, arrests, and filing criminal complaints. I am currently assigned to a squad that investigates Violent Crimes in the San Juan, Puerto Rico area.
2. Your affiant is "an investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code. Your affiant is therefore, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in Title 18, United States Code. During my employment with the FBI, I have participated in violent crime investigations along with experienced FBI Special Agents (SAs) and other Task Force Officers (hereinafter “TFOs”).
3. I make this affidavit based on the investigation conducted by myself and other federal, state, and local law enforcement agents and officers that personally investigated this matter. This affidavit does not contain all the information derived from this investigation; only that which is sufficient to demonstrate probable cause to believe that a crime has been committed.
4. This affidavit is submitted in support of an application for a complaint and an arrest warrant charging Charan Reungkhetkan (hereinafter “Charan”), a citizen of Thailand, date of birth 02/14/1978, with violating Title 18, United States Code, Section 2241 (Aggravated Sexual Abuse).

5. On 12/24/2019, at approximately 12:00am or 12:30am, after having drinks in her cabin, the victim (hereinafter “Victim”, a South African national, adult, female) and some friends made their way to the crew’s bar onboard the cruise ship where they all worked: the Insignia.
6. At approximately 1:30am the ship’s crew bar closed, but many of the crew members remained to talk and socialize; including Charan and the Victim. Most of the crew members eventually departed the bar. Charan and the Victim remained.
7. Then, Charan and the Victim departed together and proceeded to the Victim’s cabin. Charan accompanied the Victim into her cabin and the two began to engage in sexual activity.
8. During the course of the sexual activity (which eventually led to penetration), the Victim told Charan that she did not want to continue and asked Charan to “get off of her”. Charan refused. The Victim then told Charan that she was in pain and did not want to continue. The Victim then began to cry and once again told Charan that she did not consent to that sexual activity. The Victim attempted to push Charan off, but Charan held the Victim down by her shoulders. Charan told the victim that he wanted to finish first.
9. Charan eventually got off the Victim. As Charan left the Victim’s cabin he told her to tell no one of what had happened.
10. At approximately 5:30pm on 12/24/2019 the Victim’s manager onboard the Insignia reported the ship’s Human Resources manager that the Victim had informed her of the incident.
11. At approximately 8:00pm the Victim was examined by the ship’s onboard medical staff. The doctor reported tears around the victim’s vagina.
12. The FBI was notified of the incident around 9:45am on 12/25/2019 and proceeded to the Insignia to gather the evidence presented above. **Charan denied any sexual contact with the victim. He further denied interacting with her at the bar that evening.**
13. The incident took place while the MS Insignia was located in international waters, approximately 22 nautical miles west of Guadalupe (Approximate GPS Coordinates 15.885 N,

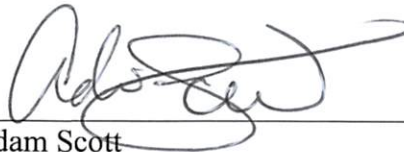
62.09167 W). The Insignia was enroute to San Juan, Puerto Rico from St. Kitts.

14. The Insignia is a merchant vessel registered in the name of Insignia Vessel Acquisition, LCC, which is a Delaware limited liability company. The ship is flagged to the Marshal Islands. The Insignia is operated by Oceania Cruises and Norwegian Cruise Line.

15. Based on information of this investigation and my experience, the undersigned has reason to believe that there is probable cause to conclude that Charan violated Title 18, United States Code, Section 2241 (Aggravated Sexual Abuse).

16. I hereby declare that the foregoing is true and correct to the best of my knowledge and belief, pursuant to the investigation conducted on this case.

Executed on this 25th day of December, 2019.



Adam Scott
Special Agent
Violent Crimes and Major Offenders
Federal Bureau of Investigation

Subscribed and sworn before me this 25th day of December, 2019, at San Juan, Puerto Rico.



Honorable Marshal Morgan
United States Magistrate Judge
District of Puerto Rico